



July 23, 2019

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59; Call Authentication Trust Anchor, CG Docket No. 17-97*

Dear Ms. Dortch:

On July 19, 2019, First Orion Corp. (“First Orion”) hosted Commissioner Michael O’Rielly and Chief of Staff Joel Miller at First Orion headquarters in Little Rock, AR. (First Orion attendees in addition to the undersigned are listed below).

During the meeting, First Orion highlighted the evolution of its analytics capabilities in light of the ongoing efforts by scammers to adjust and continue to harm US consumers. First Orion described for example the advancement from phone number-based analytics to phone call-based analytics and detailed the highly effective analysis available to its carrier partners with its real time analytics deployed in-network. When such analytics are deployed in network, individual elements of a call can be analyzed and with the application of machine learning and AI tools, a far more precise determination on whether a call is likely to be fraudulent in nature can be made.

First Orion demonstrated several of its in-market solutions, including Scam ID and Name ID (deployed with T-Mobile), as well as its enhanced caller identification solutions, Inform™ and EngageSM, which enable call originators to present in a secure manner additional information to the called party about the caller and the purpose of the call

First Orion applauded the Commission’s Declaratory Ruling authorizing opt out carrier blocking when based upon reasonable analytics and its interest in encouraging the use of SHAKEN/STIR with the proposals in the Third Further Proposed Notice of Rulemaking. First Orion expressed concerns over whether carriers will aggressively leverage the authority granted in the Declaratory Ruling without a robust safe harbor and suggested potential adoption by the

Commission of a robust safe harbor based on adoption of SHAKEN/STIR, the use of reasonable analytics, and an established process to quickly remediate false positives.

First Orion and Commissioner O’Rielly discussed the need for ongoing clarification over what constitutes reasonable analytics. While the Commission has said that a combination of certain relevant factors or objective standards (such as call volumes, bursts of calls, complaints, call duration, information gleaned from complaints, etc.) serve as reasonable analytics, the competing concern is that further specifying or providing overly prescriptive rules regarding analytics methods restricts future innovation and would give “scammers” a road map on how to revise their practices to evade blocking and could also chill innovation on call protection methods and technologies that must constantly evolve to face the ever-changing threat from scammers.

First Orion applauded Commissioner O’Rielly’s focus on “good calls” and emphasized that carriers should have in place processes to quickly unblock or un-label a number that is determined to be a lawful and/or wanted call. First Orion discussed its work with call originator industry and demonstrated its registry, [www.calltransparency.com](http://www.calltransparency.com), through which legitimate call originators can register their numbers to help prevent false positives. First Orion noted that to date, to 400,000 numbers registered, representing over 500 call originators or service providers.

Sincerely,

/s/ *John C. Ayers*

John C. Ayers

VP, Corporate Development

cc:

Joel Miller

Arielle Roth

First Orion Attendees:

Charles Morgan, CEO

Scott Hambuchen, EVP & CTO

Jennifer Glasgow, EVP & CPSO

Bryan Smith, Director Product Management

Cathleen Thompson, Product Manager

Kent Welch, Chief Data Officer

Nysia George, Chief Data Scientist

Gavin Macomber, SVP Marketing